

ORIGINAL

LAW OFFICES
BLOOSTON. MORDKOFKY. DICKENS. DUFFY & PRENDERGAST
2 120 L STREET, 'NW
WASHINGTON, DC 20037

HAROLD MORDKOFKY
BENJAMIN H. DICKENS, JR.
JOHN A. PRENDERGAST
GERARD J. DUFFY
RICHARD D. RUBINO
MARY J. SISAK
D. CARY MITCHELL
KATHLEEN A. KAERCHER
DOUGLAS W. EVERETTE

ARTHUR BLOOSTON
1914 - 1999

(202) 659-0830
FACSIMILE: (202) 828-5568

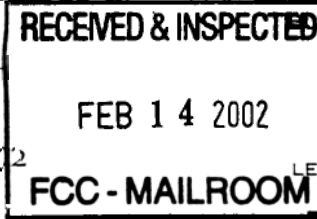
AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES
Buenos Aires, ARGENTINA

ROBERT M. JACKSON
OF COUNSEL

FERRY W. WOOFER
LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKY, J.
DIRECTOR OF ENGINEERING
PRIVATE RADIO



February 7, 2002

WRITER'S DIRECT DIAL NUMBER
202-828-S 19

Federal Communications Commission
1270 **Fairfield** Road
Gettysburg, Pennsylvania 17325-7245

Re: Mobile Communication Service Company

Dear FCC Staff:

On behalf of Mobile Communication Service Company, we are submitting herewith its Form 602 Wireless Ownership Disclosure Information for the Wireless Telecommunications Services.

Please direct any questions or correspondence regarding this filing to our office

Very truly yours,

Richard D. Rubino
Attorney for Mobile Communication
Service Company

Attachment



2/26/2 BSH

ORIGINAL

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1)) AND/OR FORFEITURE (U.S. Code, Title 67, Section 603).


Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual): Denny		MI: P	Last Name: Watson	Suffix:
2) Disclosable Interest Holder's Name (if entity):		Holder's TIN:	3b) FCC Registration Number (FRN): 0006-3295-10	
4) Disclosable Interest Holder's Address: 16343 Conneaut Lake Road, Meadville, Pennsylvania 16335				
5) Type of Interest in Applicant () (refer to Instructions for list) O, R, K, D	6) Disclosable Interest Holder is a (n): () (refer to instructions for list of codes): I		7) Percent of Interest Held in Applicant 86.777 (Non-Voting) 74.303 (Voting)	
8) Disclosable interest Holder's Type of Ownership (refer to instructions for list): C		9) Disclosable Interest Holder's Country of Citizenship: U.S.A.		
10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant):				

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

11a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):	11b) Principal Business:	11c) TIN:	11d) FCC Registration Number (FRN):	11e) Percent of Interest Held
None				


Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual).	MI:	Last Name .	Suffix
2) Disclosable Interest Holder's Name (if entity) :	3a) Disclosable Interest Holder's TIN:	3b) FCC Registration Number (FRN):	
Estate of Martha L. Watson		0006-3295-51	
4) Disclosable Interest Holder's Address:			
16343 Conneaut Lake Road, Meadville, Pennsylvania 16335			
5) Type of Interest in Applicant () (refer to instructions for list)	6) Disclosable Interest Holder is a (n): () (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant	
D	0 - Other (Estate)	13.0 (Voting)	
6) Disclosable Interest Holder's Type of Ownership (refer to instructions for list):		9) Disclosable Interest Holder's Country of Citizenship:	
C		U.S.A.	
10) Relationship Description (if the disclosable Interest holder is an indirect owner, list path of ownership from indirect owner to the applicant):			

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

11a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary).	11b) Principal Business	11c) TIN:	11d) FCC Registration Number (FRN):	11e) Percent of Interest Held.
None				

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual): Robert	MI: S	Last Name: Watson	Suffix:
2) Disclosable Interest Holder's Name (if entii):	3a) Disclosable Interest Holder's TIN: 	3b) FCC Registration Number (FRN): 0006-3296-o 1	
4) Disclosable Interest Holder's Address: 16343 Conneaut Lake Road, Meadville, Pennsylvania 16335			
5) Type of Interest in Applicant () (refer to instructions for list) O, R, K, D	6) Disclosable Interest Holder is a (n): () (refer to instructions for list of codes): I	7) Percent of Interest Held in Applicant 13.223 (Non-Voting) 12.694 (Voting)	
6) Disclosable Interest Holder's Type of Ownership (refer to instructions for list): C		9) Disclosable Interest Holder's Country of Citizenship: U.S.A.	
10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant):			

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):	IIb) Principal Business:	IIc) TIN:	IId) FCC Registration Number (FRN):	IIf) Percent of Interest Held.
None				

Exhibit 1
FCC Form 602
Page 1 of 1

Mobile Communication Service Company (MCSC) hereby requests a waiver of Sections 1.919(b) and 1.2107(f) of the Commission's Rules, 47 C.F.R. §§ 1.919(b), 1.2107(f) (200 1) to permit the late filing of its Form 602 Ownership Disclosure Information for the Wireless **Telecommunications** Services.

MCSC was a participant in the Commission's Lower and Upper Bands Paging Auction (Auction Event No. 40). At the time that the Form 601 Long-Form application was due, MCSC believed that it **already** had a current Form 602 on file with the Commission. This belief was based upon its completion and return of a Form 602 Questionnaire to counsel in connection with a proposed transaction involving another carrier. Because the transaction ultimately did not involve an assignment of an FCC radio license, the filing of the Form 602 was not required. As a result, MCSC did not realize that the Form 602 had never been filed. Upon learning that it apparently did not have a Form 602 on file **with** the Commission, MCSC immediately requested that counsel prepare a new Form 602. In preparing the Form 602, MCSC also determined that certain minor changes in ownership structure had occurred since the filing of the Form 601 long-form application. Specifically, on December 27, 2001, Martha L. Watson (mother of Denny P. Watson and grandmother of Robert S. Watson) passed away and **(b)** Denny P. Watson transferred a small amount of stock to his son, Robert S. Watson, which transfer gave Robert S. Watson a 12.694 percent voting interest and a 13.223 non-voting interest in MCSC. Neither of these events triggered a transfer of control of MCSC in that, at all times, Denny P. Watson has maintained a greater than 50 ownership interest in MCSC.

MCSC notes that the late-filing of its Form 602 has not prejudiced the Commission's determination of its ownership qualifications since, but for subsequent events, the substantive ownership information contained in the Form 602 is fully contained with its Form 601 long-form application. A review of MCSC's pending Form 601 long-form application reflects that MCSC fully disclosed its ownership information in Exhibit A as of the time of filing.¹ At no time did MCSC withhold its ownership information from the Commission. Rather, the late-filing of the Form 602 is the result of an inadvertent misunderstanding of documents that were already on file with the Commission.

MCSC submits that a grant of the instant waiver is in the public interest. MCSC is in a position to expand its facilities and bring service to its customers in rural Pennsylvania. Because of the overall light demand for paging spectrum in Auction 40, MCSC fears that a denial of the instant waiver request will delay, for an indefinite period of time, the expansion of paging services to the public.

¹ MCSC is now in the process of preparing a minor amendment to its Form 601 long-form application to reflect the minor changes in stock ownership as described above.